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MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEE

In re: Terrorist Attacks on September 11, 2001

| Plaintiffs' Executive Committee for Personal Injury and Death Claims | Plaintiffs' Executive Committee |
|--|---|
| Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP | Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR |
| Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC | J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR |

VIA EMAIL

October 15, 2019

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

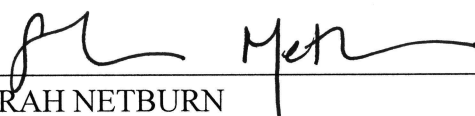
On behalf of the Plaintiffs' Executive Committees (PECs), we write to ask that the Court address two discovery issues that the PECs view to be in need of resolution before we begin the upcoming depositions of WAMY witnesses, Dr. Ibrahim Abdullah, Dr. Abdulhameed Al Mazroo, and Dr. Saleh Al Wohaibi, scheduled for Madrid during October 21-24, 2019.¹ We wrote to counsel for WAMY last week to address these items to their attention, expressing the need for a timely resolution before the depositions are to commence. *See* Attachment A, Letter to Omar Mohammedi, dated November 9, 2019. However, we have not heard back from counsel for WAMY. Because the relevant depositions are scheduled to begin next week, we are respectfully asking the Court to address these issues on an emergent basis.

While these clarifications are necessary before we embark on the depositions next week, practically speaking, if we proceed as the PECs have planned, we do not anticipate the issues to materially change the schedule that WAMY has set out for completing these witnesses' depositions. The PECs anticipate taking the depositions within the time and in the order that WAMY has

Defendants World Assembly of Muslim Youth-International and World Assembly of Muslim Youth-SA (collectively, "WAMY") shall file a response to Plaintiffs' October 15, 2019 Letter no later than 5:00 p.m. on Wednesday, October 16, 2019.

SO ORDERED.

October 15, 2019
New York, New York


SARAH NETBURN
United States Magistrate Judge